

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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*Attorney for Creditor, Pro Cap 8 FBO Firsttrust Bank*



Order Filed on September 23, 2024  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

In Re:

Shirley Simpson

Case No.: 24-11039

Adv. No.:


Hearing Date:

Judge: Andrew B. Altenburg, Jr.

**CONSENT ORDER PERMITTING LATE PROOF OF CLAIM**

The relief set forth on the following pages, numbered one (1) through three (3) is hereby  
**ORDERED.**

**DATED: September 23, 2024**

  
\_\_\_\_\_  
Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

(PAGE 2)

Debtor: Shirley Simpson

Case No: 24-11039

Caption of Order: CONSENT ORDER PERMITTING LATE PROOF OF CLAIM

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THIS MATTER having come before the Court on the Application of Pro Cap 8 FBO Firsttrust Bank (the "Creditor"), by and through Counsel, Shannon Burrini, Esquire, appearing, and the Debtor, by and through Counsel, Robert Braverman, having consented hereto and good cause having been shown;

IT is hereby, ORDERED as follows:

1. Creditor is the holder of Tax Sale Certificate #22-00396, which is secured by Property located at 5427 Burwood Ave., Camden, NJ; Block: 6115, Lot: 6.
2. Creditor is permitted to file a Proof of Claim notwithstanding its filing after the deadline imposed by Fed. R. Bankr. P. 3002(c). Creditor's Proof of Claim will be filed promptly upon entry of this Consent Order.
3. Debtor reserves the right to object to the secured Creditor's Proof of Claim once filed.

We hereby consent to the form and entry of the within Order.

**PRO CAPITAL MANAGEMENT III, LLC**

By: /s/ Shannon Burrini  
Shannon Burrini, Esq.  
Attorney for Creditor, Pro Cap 8 FBO Firsttrust Bank

**MCDOWELL LAW, PC**

By: /s/ Robert Braverman  
Robert Braverman, Esq.  
Attorney for the Debtor

In re:  
Shirley Simpson  
Debtor

Case No. 24-11039-ABA  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0312-1  
Date Rcvd: Sep 23, 2024

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 25, 2024:

Recip ID	Recipient Name and Address
db	+ Shirley Simpson, 5427 Burwood Ave., Camden, NJ 08109-4705

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 25, 2024

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 23, 2024 at the address(es) listed below:

Name	Email Address
Andrew B Finberg	on behalf of Trustee Andrew B Finberg ecfmail@standingtrustee.com ecf.mail_9022@mg.bkdocs.us
Andrew B Finberg	ecfmail@standingtrustee.com ecf.mail_9022@mg.bkdocs.us
Denise E. Carlon	on behalf of Creditor LAKEVIEW LOAN SERVICING LLC dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
John M. August	on behalf of Creditor Aristacare at Cherry Hill LLC jaugust@saiber.com, rtucker@saiber.com
Kimberly A. Wilson	on behalf of Creditor DEUTSCHE BANK NATIONAL TRUST COMPANY kimwilson@raslg.com
Laura M. Egerman	on behalf of Creditor Deutsche Bank National Trust company as trustee for GSAMP Trust 2007-FM1 mortgage pass-through

District/off: 0312-1

User: admin

Page 2 of 2

Date Rcvd: Sep 23, 2024

Form ID: pdf903

Total Noticed: 1

certificates, series 2007-FM1 laura.egerman@mccalla.com, mccallaecf@ecf.courtdrive.com

Laura M. Egerman

on behalf of Creditor DEUTSCHE BANK NATIONAL TRUST COMPANY laura.egerman@mccalla.com  
mccallaecf@ecf.courtdrive.com

Michelle Banks-Spearman

on behalf of Creditor City of Camden MiSpearm@ci.camden.nj.us  
NaHarvey@ci.camden.nj.us;LyLaracu@ci.camden.nj.us;AnMixon@ci.camden.nj.us

Robert Braverman

on behalf of Debtor Shirley Simpson rbraverman@mcdowelllegal.com  
tcuccuini@mcdowelllegal.com;jmiller@mcdowelllegal.com;lwood@mcdowelllegal.com;kgresh@mcdowelllegal.com;djamison@  
mcdowelllegal.com;cgetz@mcdowelllegal.com;bravermanrr62202@notify.bestcase.

Shannon Burrini

on behalf of Creditor Pro Cap 8 FBO Firstrust Bank shannonb@procapllc.onmicrosoft.com

Thomas G. Egner

on behalf of Debtor Shirley Simpson tegner@mcdowelllegal.com  
tcuccuini@mcdowelllegal.com;lwood@mcdowelllegal.com;kgresh@mcdowelllegal.com;djamison@mcdowelllegal.com;cgetz@  
mcdowelllegal.com;jmiller@mcdowelllegal.com;egnertr62202@notify.bestcase.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 12